

### **REMARKS**

In the Office Action, claims 1-20 were rejected, and the Specification and Drawings were objected to. By the present Response, claims 8, 9, 18 and 19 are amended, as is Figure 4 and passages from the Specification. Upon entry of the amendments, claims 1-20 will remain pending in the present Application. Reconsideration and allowance of all pending claims are requested.

#### **Objections to the Drawings**

The drawings were objected to as failing to comply with 37 CFR 1.84 (p) (4) because reference numeral 406 has been used to designate both "Select and Run Scenario Set" and "Select Plant" in Figure 4. In addition, the reference numeral 410 was not found in the drawings. Figure 4 is amended by this Response by removing the reference numeral 406 designated for the drop down box labeled "Select Plant". Figure 4 as originally filed in the application has been replaced with amended Figure 4. The amendment is believed to overcome the objection formulated by the Examiner.

#### **Objections to the Specification**

The Specification is objected to because of certain informalities. In the present Response, Applicants have amended Paragraph 35, Paragraph 36, Paragraph 37 and Paragraph 44 to clarify the informalities. The amendment is believed to overcome the objection formulated by the Examiner.

#### **Rejections under 35 U.S.C. § 102**

Independent claims 1 and 11 were rejected under 35 U.S.C.102 (b) as being anticipated by Nichols et al. (U.S. Patent 5,347,466). Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. Claims 1 and 11, and the claims depending therefrom are believed to be patentable for the reasons summarized below. Their reconsideration is requested.

Applicants respectfully assert that independent claims 1 and 11 are patentable over the cited reference. First, claim 1 recites a method of running a simulated power plant operation for a specified period of time based upon the power plant input configuration and the inputted power plant operational information. Such simulation permits actual evaluation of performance over the simulated time period. The simulated time period serves to allow evaluation of actual performance in accordance with the plant configuration and the inputted operational information.

Applicants respectfully assert that Nichols et al. disclose a simulating power plant operation only through programmed formulas or relationships. The reference does not indicate that the simulated power plant operation is simulated for a specified period of time. Indeed, the formulas or relationships implemented by Nichols et al. do not relate to actual running time periods at all, but simply provide performance results independent of simulated running time. The resulting simulation cannot provide a reliable indication of degradation or improvement in performance over time, as can the method recited in claim 1.

Accordingly, because Nichols et al. do not disclose or suggest each recitation of claim 1, or the equivalent thereof, the reference cannot not anticipate claim 1. Claim 1 and the claims depending therefrom are therefore believed to be clearly patentable over Nichols et al. Their reconsideration and allowance are respectfully requested.

Claim 11 recites a simulation tool that comprises a simulation engine for running a simulated power plant operation for a specified period of time based upon the power plant input configuration and the input power plant operational information. Here again, Applicants respectfully assert that the Nichols et al. reference discloses a simulation engine for simulating power plant operation, but does not confirm the running of the simulated power plant for a specified period of time. Thus, as discussed above with respect to claim 1, Nichols et al. cannot anticipate claim 11. Accordingly, claim 11 and

the claims depending therefrom are believed to be clearly patentable over Nichols et al., and their reconsideration and allowance are respectfully requested.

Therefore, Applicants respectfully submit that the present invention, as recited in independent claims 1 and 11 is patentably distinguishable over Nichols et al. Thus, it is respectfully requested that the rejections of claims 1 and 11 under 35 U.S.C.102 (b) be withdrawn.

**Rejections under 35 U.S.C. § 103**

In the Office Action, claims 2-6, 8-10, 12-16, and 18-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nichols et al. in view of Hayashi et al. Also, claims 7 and 17 were rejected under 35 U.S.C. 103(a) as being unpatentable over Nichols et al. in view of Hayashi et al. as applied to claims 2 and 12, and further in view of Eastman et al.

Each of the cited claims depends directly or indirectly from claims 1 or 11. The secondary references have been examined and do not obviate the deficiencies of Nichols et al. discussed above. Nor does the Examiner contend that they do so. Accordingly, the dependent claims are believed to be clearly allowable both by virtue of their dependence from an allowable base claim, and for the separate subject matter that they recite. Their reconsideration and allowance are requested.

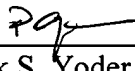
In view of the above remarks, Applicants submit that claims 1-20 are patentably distinguishable over Nichols et al., as well as the various combinations proposed by the Examiner. Accordingly, Applicants request reconsideration and allowance of claims 1-20.

**Conclusion**

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: 11/17/2004

  
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**IN THE DRAWINGS**

Please replace the sheet of drawings containing Figure 4 with the attached amended drawing sheet.